

District Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

E.L.A. and O.L.C.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. C20-1524-RAJ

THIRD STIPULATED MOTION FOR  
ORDER OF 30-DAY ABEYANCE

NOTE ON MOTION CALENDAR:  
NOVEMBER 5, 2021

The Parties, by and through the undersigned counsel, jointly stipulate and move the Court for a 30-day abeyance of this matter. On September 8, 2021, the Court granted the parties' second request for a 60-day abeyance. Dkt. No. 28.

Over the past 60 days, the United States and the group of counsel coordinating negotiations on behalf of plaintiffs and claimants ("Coordinating Counsel") have continued to work diligently in an effort to resolve the many district court cases and administrative tort claims that have been filed by claimants across the country, arising from family separations at the U.S./Mexico border that occurred during the prior administration. An agreement has not been reached. However, a further abeyance will allow the parties to continue focusing their efforts on attempting to resolve these matters. Accordingly, the parties jointly request that this action, including all proceedings and case deadlines, be held in abeyance for an additional 30 days.

Therefore, the parties stipulate and agree that good cause exists for an Order:

1. Holding this matter in abeyance for 30 days until December 8, 2021;

2. That, if this matter is not settled by December 8, 2021, the parties will jointly update the Court and either seek an additional abeyance or continue the litigation.

Respectfully submitted,

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s/ Aaron Korthuis

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s/ Margot Adams

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Attorneys for the United States

**ORDER**

**IT IS SO ORDERED.**

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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The Honorable Richard A. Jones  
United States District Judge